

EXHIBIT B



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February 10, 2020

Ricky Franklin
708 Brambling Way
Stockbridge, GA 30281

Re: *Franklin v. Bison Recovery Group, Inc.*
Case No.: 18-cv-161 (WDNY)

Dear Mr. Franklin:

Our office represents Defendant Bison Recovery Group, Inc. ("Bison Recovery") in this matter. On January 6, 2020 our office served Bison Recovery's Request for Production and Interrogatories on you. At this time, your responses are past due, despite having filed your motion for summary judgment. Please advise when you are available to meet and confer the week of February 10, 2020 to discuss your responses to Bison Recovery's discovery demands.

Very truly yours,

Lippes Mathias Wexler Friedman LLP



Tessa R. Scott

TRS/jms

Tessa R. Scott | Associate | tscott@lippes.com

New York: Albany, Buffalo, New York City • Florida: Ponte Vedra Beach • Ontario: Greater Toronto Area • Washington, D.C.

To: 'Rick Franklin'
Cc: Brendan H. Little
Subject: RE: Franklin v. Bison Recovery

From: Tessa R. Scott
Sent: Monday, February 10, 2020 5:09 PM
To: 'Rick Franklin' <rrfrank12@hotmail.com>
Cc: Brendan H. Little <blittle@lippes.com>
Subject: RE: Franklin v. Bison Recovery

Dear Mr. Franklin,
Please respond to the outstanding discovery demands by the close of business on February 14, 2020, so we do not have to seek judicial intervention.
-Tessa

From: Rick Franklin <rrfrank12@hotmail.com>
Sent: Monday, February 10, 2020 4:41 PM
To: Tessa R. Scott <tscott@lippes.com>
Cc: Brendan H. Little <blittle@lippes.com>
Subject: Re: Franklin v. Bison Recovery

Good day,

1. I received your limited questions, in the middle of January, after my MSJ was filed. Everything I have as evidence is part of my motion for summary judgment. Your client admitted to not having any evidence, as all the evidence was destroyed by your client in 2016. You have my summary judgment motion, if you would like for me to send over the information that you already have, I will...but you and I both know that is a waste of time and resources.
2. Additionally, we were supposed to submit Fed. R. Civ. P. 26(a) by January 31st, 2020. Those were not submitted by your office, so I have no idea of what you may have or attempt to create as part of your evidence.
3. Before you joined the case, I emailed and called Mr Little to no avail. I got no response, as I tried to discuss the case per the local rules require....your firm has even tried to dismiss the case on frivolous grounds of not being served in a timely manner.
4. With all that being said...I can send over what you already have. Let me know how you wish to proceed?

Regards

From: Tessa R. Scott <tscott@lippes.com>
Sent: Monday, February 10, 2020 2:11 PM
To: rrfrank12@hotmail.com <rrfrank12@hotmail.com>
Cc: Brendan H. Little <blittle@lippes.com>
Subject: Franklin v. Bison Recovery

Mr. Franklin,

Our office represents Defendant Bison Recovery Group in this matter. On January 6, 2020 our office served Bison Recovery's Request for Production and Interrogatories on you. At this time, your responses are past due, despite having filed your motion for summary judgment. Please advise when you are available to meet and confer the week of February 10, 2020 to discuss your responses to Bison Recovery's discovery demands.

My best,
Tessa Scott

Tessa R. Scott
Associate



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